



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 8, MONTANA OFFICE**  
**FEDERAL BUILDING, 10 West 15<sup>th</sup> St, Suite 3200**  
**HELENA, MONTANA 59626**

Ref: 8MO

April 2, 2012

Mr. Kevin Riordan, Forest Supervisor,  
Helena National Forest  
2880 Skyway Drive  
Helena, Montana 59602

Re: CEQ # 20120064; EPA Comments on Cabin Gulch  
Vegetation Treatment Project FEIS and ROD

Dear Mr. Riordan:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Helena National Forest's Cabin Gulch Vegetation Treatment Project in accordance with our responsibilities under the Section 102(2)(C) of National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The FEIS/ROD indicates that the Helena National Forest has selected a combination of activities from each of the action alternatives for implementation with the activities selected most similar to Alternative 2. A total of 2,891 acres of vegetative treatments have been selected for implementation including intermediate harvests and pre-commercial thinning on 1,872 acres, regeneration harvests on 417 acres, and prescribed fire on 602 acres, with 1,276 acres of ground based tractor logging, 672 acres of skyline cable logging and 291 acres of helicopter logging. Associated with proposed vegetative treatments would be construction of 2.3 miles of new temporary road and 4.2 miles of short-term specified roads, which would all be obliterated after project implementation. Approximately 9.5 miles of existing roads will also be decommissioned, and road BMPs would be implemented on all roads used for timber harvest and hauling.

We acknowledge the purpose and need for the proposed vegetative treatments to improve resistance and resiliency of vegetation to disturbance processes (e.g., wildfire, insects and disease), reduce forest fuels and fire risks, and provide timber products to local communities. We have some concern, however, regarding the remaining aspect of the project purpose and need which is to improve water quality, since the project area includes water quality impaired Deep Creek for which a Total Maximum Daily Load (TMDL) has been prepared to reduce sediment pollution and restore full support for beneficial uses in Deep Creek. Decommissioning of Forest Road 4181, adjacent to the West Fork Cabin Gulch (tributary to Deep Creek), had previously been proposed, but has now been dropped from the final selected alternative. It is now proposed that this road will remain open to motorized use yearlong, even though the ROD acknowledges that decommissioning West Fork Cabin Gulch road would provide the most water quality improvement over the long term.


The West Fork Cabin Gulch road has a “high” rating for cumulative watershed/geologic concern; high risk to watershed values with 9 road/stream interactions, 0.98 miles in highly erosive soils, and 2.4 miles in the riparian area; and is severely rutted with actively eroding gullies present along almost the entire road. Fine sediment in spawning habitat for West Fork Cabin Gulch is outside the upper range of variation for sediment management goals for fisheries likely due to this road. This road is no longer proposed for decommissioning, since the road historically provided motorized public access to a large portion of the project area, and many individuals expressed interest in continued use of the road, in part due to reduced access opportunities elsewhere. The ROD indicates that the Forest engineering staff and hydrologist conducted a detailed analysis of potential road improvements, including potential realignment, improved surface conditions, drainage and spot application of screened aggregate, and concluded that an investment of \$42,000 will address the immediate sediment delivery that is occurring. The ROD commits to improving the existing road to reduce short term sediment delivery to approach the sediment reductions which would have been realized by road obliteration.

We acknowledge the Forest’s desire to continue to provide public access via this road, and address sediment delivery concerns from Forest Road 4181. We also appreciate the proposed investment of funds to address immediate road maintenance needs, as well as proposed decommissioning of 9.5 miles of existing roads to reduce road sediment transport to streams. However we remain concerned about long-term water quality effects, since it is known that there is a significant backlog of National Forest road maintenance needs and there has been prolonged under-funding of road maintenance on National Forests (Source: “Rightsizing” the Forest Service Road System Part 1: Road Trend Analysis, March 22, 2007). Forest roads often fall into disrepair over time and adversely affect watersheds and water quality through chronic erosion, or are at risk for mass failure from crossings or when roads are located adjacent to streams or on sensitive land types. We are concerned about the adequacy of funding to maintain the Forest Road 4181 over the long-term, since even if the immediate existing problems are corrected the road may fall into disrepair without routine annual maintenance. Can the Forest assure that this road will be properly maintained to limit sediment delivery to the West Fork Cabin Gulch and its downstream tributary Deep Creek over the long-term? We continue to believe that decommissioning of this road would provide the best long-term protection for water quality in the West Fork of Cabin Gulch and Deep Creek.

While we have water quality concerns about the long-term consequences of not decommissioning Forest Road 4181 adjacent to West Fork Cabin Gulch, we also appreciate the Forest’s efforts to otherwise address water quality concerns by harvesting Units 48, 49, 50, 51, 55, 59 and 80 on snow covered and/or frozen ground, and including other harvest and burn prescriptions to reduce potential water quality and detrimental soil disturbance impacts. We also appreciate receipt of the responses to EPA’s DEIS comments in Appendix E of the FEIS. We continue to consider Alternative 3 to be the environmentally preferred alternative, since it would have the greatest potential to improve water quality in the project area, and would be most consistent with the reduced sediment delivery goals of the Deep Creek TMDL. The TMDL goals for Deep Creek are to reduce sediment loads and percent fine sediment in stream substrates, reduce erosive banks, restore channel length, increase recruitment of spawning wild trout, and reduce thermal problems and dewatering.

Thank you for the opportunity to review and comment during the EIS process. If you have any questions please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at [potts.stephen@epa.gov](mailto:potts.stephen@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Julie A. DalSoglio", with a horizontal line extending from the end of the signature.

Julie A. DalSoglio  
Director  
Montana Office

cc: Suzanne Bohan/Judy Roos, EPA 8EPR-N, Denver  
Robert Ray/Dean Yashan/Mark Kelley, MDEQ, Helena

